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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

REGINA CASTRO,

Plaintiff,

vs.

COUNTY OF LOS ANGELES, CHAD
MELTON, and DOES 1-10, inclusive,

Defendants.

Case No.: 2:23-cv-02810-WLH-MARx
[Honorable Wesley L. Hsu]
Magistrate Judge Margo A. Rocconi

**JOINT STATUS REPORT
REGARDING POTENTIAL
CONDITIONAL SETTLEMENT OF
ENTIRE ACTION; REQUEST TO
CONTINUE AND/OR VACATE
DATES**

Action filed: April 14, 2023
Trial Date: March 25, 2025

TO THE HONORABLE COURT:

1 The parties, Plaintiff, REGINA CASTRO and Defendants, COUNTY OF
2 LOS ANGELES, and CHAD MELTON, by and through their counsel of record,
3 hereby notify the Court that the parties are actively engaged in settlement
4 discussions and believe there is the potential for a conditional settlement of the
5 entire matter.

- 6 1. The Parties participated in a mediation on December 15, 2023, with mediator
7 Judge Joseph Biderman (Ret.). The mediation concluded with the parties
8 coming to an agreement regarding a potential conditional settlement that
9 would be presented by defense counsel for consideration by the County
10 Contract Cities Claims Board. The case is on the Contract Cities agenda for
11 consideration on January 17, 2024, which is the earliest possible date.
- 12 2. If the Contract Cities Claims Board elects to proceed with the proposed
13 settlement, the parties will proceed to finalize a settlement agreement and
14 begin the County's approval process, which entails final approval by the
15 Contract Cities Claims Board and the County of Los Angeles Board of
16 Supervisors.
- 17 3. If the Settlement is approved, the Parties will file a stipulation to dismiss the
18 entire action with prejudice within ten days of Plaintiffs' receipt of the
19 settlement funds.
- 20 4. Accordingly, the parties request that the Court vacate all pending trial and
21 trial-related deadlines, including the status conference regarding the limited
22 stay of discovery that is set for January 4, 2024. Defense counsel anticipates
23 that the settlement approval process could take up to nine months to be
24 finalized. The Parties further agree and request that if the settlement is not
25 approved, then this Court shall reset the dates in this case.

1 **Respectfully submitted,**

2 DATED: December 27, 2023

LAW OFFICES OF DALE K. GALIPO

3
4 By: /s/ Dale K. Galipo

Dale K. Galipo, Esq.

5 Marcel F. Sincich, Esq.

6 Shannon J. Leap, Esq.¹

Attorneys for Plaintiff REGINA CASTRO

8 DATED: December 27, 2023

CARPENTER, ROTHANS & DUMONT

10
11 By: /s/ Jill Williams

JILL WILLIAMS

12 SCOTT J. CARPENTER

13 *Attorneys for Defendant* COUNTY OF LOS
14 ANGELES

15 DATED: December 27, 2023

SEKI, NISHIMURA & WATASE, LLP

17 By: /s/ Janet L. Keuper

18 Janet L. Keuper

19 *Attorneys for Defendant* CHAD MELTON

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26 _____
27 ¹ I, Shannon J. Leap, hereby attest that all the signatories listed, and on whose behalf the filing is
28 submitted, concur in the content of this Joint Scheduling Conference Report and have authorized
its filing.